

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN**

GRACE CHEN and DANIELLE  
VILLARREAL, individually and on  
behalf and all other similarly situated,

Case No. 1:23-cv-01129

Plaintiffs,

Judge Jane M. Beckering  
Mag. Judge Phillip J. Green

v.

HILLSDALE COLLEGE,  
  
Defendant.

**DEFENDANT HILLSDALE COLLEGE'S UNOPPOSED MOTION TO EXTEND  
DEADLINE FOR HILLSDALE COLLEGE TO RESPOND  
TO PLAINTIFFS' AMENDED COMPLAINT**

**EXPEDITED CONSIDERATION REQUESTED**

Defendant Hillsdale College, through its undersigned counsel, hereby moves to extend the deadline for Hillsdale College to answer or otherwise respond to Plaintiffs' Amended Complaint (ECF No. 19), which is currently set for January 25, 2024. Fed. R. Civ. P. 15(a)(3). Hillsdale College respectfully requests to move the deadline for responding to the Amended Complaint by one additional week, which would be due on February 1, 2024.

As grounds for this Motion, Hillsdale College states the following in support of modifying the existing deadline:

1. Plaintiffs brought their initial class action complaint against Hillsdale College on October 25, 2023. ECF No. 1.
2. The parties previously stipulated to and the Court granted an extension to the deadline for Hillsdale College's response to Plaintiffs' initial complaint. ECF No. 8, PageID.53–54.

3. On December 22, 2023, as its first responsive pleading, Hillsdale College timely filed a motion to dismiss (ECF No. 11) and a motion to strike the class allegations from Plaintiffs' initial complaint (ECF No. 16). Hillsdale College also moved for leave to file a supporting brief with excess pages (ECF Nos. 12, 15).

4. On December 27, 2023, without addressing the merits of Hillsdale College's pending motions, the Court afforded Plaintiffs the opportunity to cure the inadequate pleading by granting Plaintiffs leave to file an amended complaint, as allowed by Rule 15(a)(1)(B). ECF No. 18, PageID.219–220.

5. On January 11, 2024, Plaintiffs filed the Amended Complaint (ECF No. 19), superseding their initial complaint and mooted Hillsdale College's motion to dismiss and motion to strike.

6. Consistent with its previous order (ECF No. 18), the Court dismissed Hillsdale College's motion to dismiss and motion to strike as moot on January 18, 2024. ECF No. 20, PageID.276.

7. Under Rule 15(a)(3), unless the Court orders otherwise, Hillsdale College has 14 days to respond to the Amended Complaint, in which the deadline is currently set for January 25, 2024.

8. Hillsdale College intends to move to dismiss in response to the Amended Complaint. Because of the complexity of the legal issues and Plaintiffs' new and revised allegations, Hillsdale College respectfully requests to move the deadline for responding to the Amended Complaint by one additional week, which would be due on February 1, 2024.

9. Counsel for Hillsdale College sought concurrence from Plaintiffs' counsel for the requested one-week extension for its response, but Plaintiffs' declined to concur in the relief

sought, stating only that they would “not oppose Hillsdale’s motion for a one-week extension.”

**Exhibit 1**, Certificate of Concurrence Request.

10. Because the deadline for Hillsdale College’s response is January 25, 2023, expedited concurrence is necessary

11. Consistent with LCivR 5.7(g), Hillsdale College includes a Proposed Order with this filing. **Exhibit 2**.

WHEREFORE, Defendant Hillsdale College respectfully requests that the Court enter an order extending the deadline for Hillsdale College to respond to Plaintiffs’ Amended Complaint to February 1, 2024.

Respectfully submitted,

BUTZEL LONG,  
a professional corporation

By: /s/ Sarah L. Nirenberg  
Carey A. DeWitt (P36718)  
Sarah L. Nirenberg (P77560)  
201 W. Big Beaver Road, Suite 1200  
Troy MI 48084  
248.258.1616  
[dewitt@butzel.com](mailto:dewitt@butzel.com)  
[nirenberg@butzel.com](mailto:nirenberg@butzel.com)  
*Attorneys for Defendant*

Dated: January 19, 2024

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Defendant.

**BRIEF IN SUPPORT OF MOTION TO EXTEND DEADLINE  
FOR HILLSDALE COLLEGE TO ANSWER OR OTHERWISE RESPOND TO  
PLAINTIFFS' AMENDED COMPLAINT**

Defendant Hillsdale College relies on the statements of fact and law set forth in its Motion in support of its request to move the deadline for responding to the Amended Complaint by one additional week, which would be due on February 1, 2024.

Respectfully submitted,

BUTZEL LONG,  
a professional corporation

By: /s/ Sarah L. Nirenberg

Carey A. DeWitt (P36718)  
Sarah L. Nirenberg (P77560)  
201 W. Big Beaver Road, Suite 1200  
Troy MI 48084  
248.258.1616  
[dewitt@butzel.com](mailto:dewitt@butzel.com)  
[nirenberg@butzel.com](mailto:nirenberg@butzel.com)  
*Attorneys for Defendant*

Dated: January 19, 2024